


COMPANY APPROVED PROCEDURE		<b>CAP</b>	
TITLE: WHISTLEBLOWING PROTECTION PROCEDURE		Doc. No:	CAP13-014
		Issue:	B

	PREPARED BY	APPROVED BY	QA RELEASE
<b>NAME</b>	WAN ZAMAKHSHARI WAN SHAFIE	MUSTAFA MAULA EBEE	NOR ASRAR KAMARUDDIN
<b>DESIGNATION</b>	Executive	Certified Integrity Officer	QA DCC
<b>DATE</b>	30.03.2026	30.03.2026	

### TABLE OF CONTENT

Section	Description	Page
1.0	PURPOSE .....	2
2.0	SCOPE .....	2
3.0	ABBREVIATION / DEFINITION.....	2
4.0	RESPONSIBILITIES.....	4
5.0	PROCEDURES.....	4
6.0	REFERENCES .....	8
7.0	AMENDMENT RECORDS.....	9

<p align="center"><b>COMPANY APPROVED PROCEDURE</b></p>		<p align="center"><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

## 1.0 PURPOSE

This Whistleblowing Protection Procedure aims to establish a safe, confidential, and effective mechanism for employees, internal and external stakeholders, and the public to report genuine concerns about unethical, illegal, or improper conduct within CTRM Holdings Sdn Bhd and its subsidiaries (CTRM Group), without fear of retaliation.

## 2.0 SCOPE

The procedure applies to:

- a) Board of Directors.
- b) Senior Management.
- c) All employees of CTRM Group, regardless of rank or role.
- d) Business associates and third parties.
- e) Any individual interacting with CTRM Group who wishes to report any improper conduct or wrongdoing.


## 3.0 ABBREVIATION / DEFINITION

### 3.1 Abbreviation

- |                         |  |
|-------------------------|--|
| <b>3.1.1 ABAC</b>       | Anti-Bribery and Anti-Corruption   |
| <b>3.1.2 CTRM Group</b> | CTRM Holdings Sdn. Bhd. and its subsidiaries: <ol style="list-style-type: none"> <li>1. CTRM Aero Composites Sdn. Bhd.</li> <li>2. CTRM TestLab Sdn. Bhd.</li> <li>3. CTRM CE Sdn. Bhd.</li> </ol> |
| <b>3.1.3 RIC</b>        | Risk, Insurance, Incentive, Integrity, Compliance & Continuity   |
| <b>3.1.4 IU</b>         | Integrity Unit   |

### 3.2 Definition

- Board of Directors** Any person occupying the position of a director of CTRM Group by whatever name called and includes a person in accordance with whose directions or instructions the majority

<p style="text-align: center;"><b>COMPANY APPROVED PROCEDURE</b></p>		<p style="text-align: center; font-size: 2em;"><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

of directors of CTRM Group are accustomed to act, and an alternate or substitute director.

**Bribery**

Offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties.

**Business Associate**

External party with whom CTRM Group has, or plans to establish, some form of business relationship. Business Associate includes, but not limited to clients, customers, outsourcing providers, contractors, vendors, consultants, suppliers, distributors, agents, and representatives.

**Corruption**

Act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.

**Employees**

Employees of the Company, as well as contracted staff.

**Enforcement Authority**

Any government agency responsible for the enforcement of the laws e.g., Malaysian Anti-Corruption Commission (MACC), Royal Malaysian Police, etc.

**Improper Conduct**

Any conduct which if proved, constitutes a disciplinary offence or a criminal offence.

**Third Party**

Person or body that is independent of the CTRM Group.

**Senior Management**

The highest level of management team in an entity, led by the CEO and his direct reports.

**Whistleblower**

Any person who makes a disclosure of improper conduct to the enforcement agency under Section 6 of Whistleblower Protection Act, 2010 (Act 711).

**Whistleblowing Channels**

Any medium of communication that provides an additional avenue to report or disclose any attempted, suspected, and actual bribery or corruption, as well as any other improper conduct (e.g. whistleblowing hotline, e-mail, letter, mailbox, etc.). Any report or disclosure through whistleblowing channels

<p align="center"><b>COMPANY APPROVED PROCEDURE</b></p>		<p align="center"><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

will be dealt in confidential manners, to protect the identity of the reporter and of others involved or reference in the report.

## 4.0 RESPONSIBILITIES

The ABAC Working Committee and/or Head of RIC are responsible to review and approve this documented Whistleblowing Protection Procedure prior to its issuance (and subsequent revision, if any).

## 5.0 PROCEDURES

### 5.1 What to Report

Examples of **improper conduct** or reportable concerns include, but are not limited to:

- a) Suspected, attempted, or actual incidences of bribery, corruption, or fraud.
- b) Misuse/Embezzlement/Misappropriation of company funds or assets.
- c) Abuse of power/authority.
- d) Breach of trust.
- e) False claims and/or forgery of documents.
- f) Harassment, discrimination, extortion, or unethical workplace practices.
- g) Suspected, attempted, or actual conduct or activity, which violates any laws or regulations of Malaysia.
- h) Suspected, attempted, or actual breach of the Company's policies, codes, standard operating procedures, work instructions, or guidelines.
- i) Any other detrimental wrongdoings or improper conduct.

### 5.2 Information Required

Whistleblower submits a detailed disclosure, including:

- a) Type of activity or conduct.
- b) Details of suspected personnel or party involved.

<p align="center"><b>COMPANY APPROVED PROCEDURE</b></p>		<p align="center"><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

- c) Details of incident (including place, date, and time of incident, as well as names of those involved).
- d) Transaction amount and type (if it known).
- e) Any document, information, or physical evidence relating to the report or complaint.

### 5.3 Reporting Channels

CTRM adopts the DRB-HICOM Group’s Whistleblowing Policy to provide an additional avenue for reporting or disclosing any attempted, suspected, or actual bribery, corruption, or other improper conduct. Reports or disclosures will be handled confidentially to protect the identity of the whistleblower and others involved.

Whistleblowers can report concerns through any of the following DRB-HICOM Group’s whistleblowing channels:

- **Dedicated Whistleblowing Hotline:** 1-800-88-2005
- **Email:** [whistleblowing@drb-hicom.com](mailto:whistleblowing@drb-hicom.com)
- **In Writing:** Chief Internal Audit & Integrity Officer  
Group Internal Audit & Integrity Division,  
Level 5, Wisma DRB-HICOM,  
No. 2, Jalan Usahawan U1/8, Seksyen U1,  
41500 Shah Alam, Selangor.
- **Whistleblowing Mailbox:** Located at Level 1 and Level 5 of Wisma DRB-HICOM

### 5.4 Confidentiality and Anonymity

5.4.1 Whistleblowers have the right to report concerns without fear of reprisal/retaliation.

<p><b>COMPANY APPROVED PROCEDURE</b></p>		<p><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

- 5.4.2 Whistleblowers may report anonymously however, providing contact information is encouraged to facilitate follow-up. While anonymous reporting is permitted, it may limit the effectiveness of the investigation.
- 5.4.3 All reports, whether anonymous or named, will be treated with the highest level of confidentiality.
- 5.4.4 CTRM prohibits retaliation against whistleblowers. Any form of retaliation (e.g. dismissal, demotion, harassment, threats, discrimination, etc.) against a whistleblower is strictly prohibited and may result in disciplinary action.
- 5.4.5 Whistleblowers who intentionally make malicious or false reports may face disciplinary actions, including termination of employment, depending on the severity of the act.

## 5.5 Whistleblower Protection

- 5.5.1 Under the Whistleblower Protection Act 2010, the whistleblower is entitled to:
- All reports/complaints/concerns will be treated with strict confidentiality to protect the whistleblower's identity.
  - Immunity from civil, criminal or disciplinary actions resulting from the disclosure.
  - Protection against detrimental action such as dismissal, demotion, harassment or victimisation.
- 5.5.2 The protection is applicable only if the disclosure:
- Is made in good faith or on the basis of a reasonable belief.
  - Relates to improper conduct within CTRM Group.
  - Is made to an authorised recipient designated under DRB-HICOM Group's Whistleblowing Policy and channels.

<p align="center"><b>COMPANY APPROVED PROCEDURE</b></p>		<p align="center"><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

## 5.6 Investigation and Outcome

- 5.6.1 An independent investigator or team from the DRB-HICOM Group, such as the Group Internal Audit & Integrity Division, will carry out a comprehensive investigation, maintaining strict confidentiality at every stage of the process.
- 5.6.2 The findings will be presented to the relevant authority. Appropriate actions, including disciplinary or legal measures, will be taken if the improper conduct/misconduct is substantiated.
- 5.6.3 CTRM Group is responsible to lodge report on any breach or violation to ABAC laws and regulations, involving any of its Board of Directors, Senior Management, employees, business associates or third parties to the relevant enforcement authorities.
- 5.6.4 Whistleblowing Process:
- a) Findings are tabled to the Corporate Governance Committee (“CGC”) and the relevant Operating Company Board before submission to the Board Audit Committee (“BAC”) of DRB-HICOM Berhad.
  - b) The Operating Company Chief Executive Officer (“CEO”) is invited to the CGC meeting to explain the findings and present management action plans.
  - c) The Chief Internal Audit & Integrity Officer (“CIAIO”) then issues an official memorandum to the CEO, detailing the findings, committee directives, and required mitigating actions for implementation and monitoring.
  - d) The IU should periodically request from GIAID’s Investigation Unit the statistics of whistleblowing reports and investigations involving CTRM Holdings and its subsidiaries for the purpose of ABMS monitoring.
  - e) The IU should report the consolidated statistics and investigation outcomes in the ABMS management review for continuous improvement (if any).

<p align="center"><b>COMPANY APPROVED PROCEDURE</b></p>		<p align="center"><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

## 5.7 Roles and Responsibilities

### 5.7.1 Senior Management

- i) Promote a culture of integrity and transparency by encouraging ethical behavior and fostering an environment where reporting concerns is supported and valued.
- ii) Ensure the whistleblowing procedure is communicated to all employees and stakeholders, internally and externally.
- iii) Take swift and fair action against proven improper conduct/misconduct.

### 5.7.2 Employees and Stakeholders

- i) Avoid making public accusations before going through the appropriate channels.
- ii) Provide honest and accurate information when reporting, and ensure that concerns are raised in good faith or on the basis of a reasonable belief.
- iii) Refrain from engaging in retaliation against whistleblowers.

## 6.0 REFERENCES

ABAC-01	Anti-Bribery and Anti-Corruption Policy
DRB-POL-IA-01	DRB-HICOM Group's Whistleblowing Policy
MACC Act	Malaysian Anti-Corruption Commission (MACC) Act, 2009 (Act 694) and amendments
Whistleblower Protection Act	Whistleblower Protection Act 2010 (Act 711)
Section 17A, MACC Act	Guidelines on Adequate Procedures Pursuant to the Subsection [5] of Section 17A under the MACC Act, 2009, issued by the Prime Minister's Department (10 December 2018)

<p align="center"><b>COMPANY APPROVED PROCEDURE</b></p>		<p align="center"><b>CAP</b></p>	
<p><b>TITLE: WHISTLEBLOWING PROTECTION PROCEDURE</b></p>		<p>Doc. No:</p>	<p>CAP13-014</p>
		<p>Issue:</p>	<p>B</p>

**7.0 AMENDMENT RECORDS**

Issue	Date	Description	Amendment by
B	09 Mar 2026	Add para 6.6.4 clause d and e	Wan Zamakhshari
A	04 Feb 2025	First issued.	Wan Zamakhshari